

1
Lisa Ann White
3/29/10

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

PATTY BEALL, MATTHEW)
MAXWELL, TALINA MCELHANY,)
AND KELLY HAMPTON,)
individually and on behalf)
of all other similarly)
situated,,)
Plaintiffs,)

No. 2:08-cv-422 VS

TYLER TECHNOLOGIES, INC.)
AND EDP ENTERPRISES, INC.,)
Defendants.)

ORAL DEPOSITION OF

LISA ANN WHITE

3/29/10

ORAL DEPOSITION OF LISA ANN WHITE,

produced as a witness at the instance of the DEFENDANTS,
and duly sworn, was taken in the above-styled and
numbered cause on the 29th day of March, 2010, from
1:29 p.m. to 4:05 p.m., before TINA TERRELL BURNEY, CSR
in and for the State of Texas, reported by machine
shorthand, at the offices of SLOAN, BAGLEY, HATCHER &
PERRY, 101 East Whaley Street, Longview, Texas 75601,
pursuant to the Federal Rules of Civil Procedure.

 **COPY**

Osteen Reporting Services

(817) 498-9990

EXHIBIT 6

A P P E A R A N C E S

FOR THE PLAINTIFFS:

Ms. Laureen F. Bagley
SLOAN, BAGLEY, HATCHER & PERRY
101 East Whaley Street
Longview, Texas 75601

(903) 757-7000 (telephone)
(903) 757-7574 (facsimile)

Ms. Chandra Holmes Ray
ZELBST HOLMES & BUTLER
P.O. Box 365
Lawton, Oklahoma 73502

(580) 248-4844

FOR THE DEFENDANTS:

Mr. Paulo B. McKeeby
MORGAN, LEWIS & BOCKIUS LLP
1717 Main Street
Suite 3200
Dallas, Texas 75201

(214) 466-4000 (telephone)
(214) 466-4001 (facsimile)

3
Lisa Ann White
3/29/10

1	INDEX	
2		PAGE
3	Appearances.....	2
4	LISA ANN WHITE	
5	Examination by Mr. McKeeby.....	4
6	Signature and Changes.....	108
7	Reporter's Certificate.....	110

8		
9	EXHIBITS	
10	NO. DESCRIPTION	PAGE
11	1 - Ms. White's time sheets	23
12	2 - Declaration of Lisa White	88
13	3 - Ms. White's Consent to Opt-In	101

14		
15		
16	EXHIBITS PREVIOUSLY MARKED	
17	NO. DESCRIPTION	PAGE
18	McElhany 3 - Job Description Form	83

4
Lisa Ann White
3/29/10

1 LISA ANN WHITE,
2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 BY MR. MCKEEBY:

01:29PM 5 Q. Will you please state your name for the
6 record?

7 A. Lisa Ann White.

8 Q. Ms. White, my name is Paulo McKeeby. We met
9 before the deposition, but you understand that I
01:29PM 10 represent the company called Tyler Technologies?

11 A. Yes.

12 Q. In connection with a lawsuit that you joined?

13 A. Yes.

14 Q. And you understand that Tyler Technologies
01:29PM 15 acquired a company called EDP?

16 A. Yes.

17 Q. And you used to work for EDP?

18 A. Yes.

19 Q. Here in Longview?

01:29PM 20 A. Yes.

21 Q. And you never worked for Tyler?

22 A. No.

23 Q. You left EDP before the acquisition?

24 A. Yes.

01:29PM 25 Q. What were your dates of employment with EDP?

5
Lisa Ann White
3/29/10

1 A. February of '04 to March of '07.

2 Q. And during that time, you were in the
3 designation of client liaison?

4 A. Yes.

01:30PM 5 Q. That was your only job title while you were at
6 EDP?

7 A. Yes.

8 Q. To whom did you report? Who was your
9 supervisor?

01:30PM 10 A. When I began, it was Daniel Knight.

11 Q. Is that K-N-I --

12 A. K-N-I-G-H-T.

13 Q. What was his position?

14 A. He was an implementation manager.

01:30PM 15 Q. And did someone else become your supervisor?

16 A. Lisa Payne.

17 Q. Did she have the same title?

18 A. Yes. All of these did.

19 Q. Okay.

01:30PM 20 A. And then Cathy Mount, C-A-T-H-Y, and Chandra
21 Robbins.

22 Q. And she was the implementation manager when you
23 left EDP's employment?

24 A. Yes.

01:31PM 25 Q. Why did you leave EDP's employment?

1 A. To become the business manager for Dangerfield
2 schools.
3 Q. Just a better job?
4 A. Yes.
01:31PM 5 Q. Is that your current position?
6 A. Yes.
7 Q. And is that the title, business manager?
8 A. Yes.
9 Q. What do you do as business manager for the
01:31PM 10 Dangerfield School District?
11 A. I oversee the financial functions of the
12 district. I supervise two employees. I work with the
13 auditors. I work with TEA on whatever financial
14 functions need to be done.
01:31PM 15 Q. What's TEA?
16 A. Texas Education Agency.
17 Q. Have you always had the same job function since
18 you've been a business manager for the Dangerfield School
19 District?
01:32PM 20 A. Yes.
21 Q. When you applied for a position with the
22 Dangerfield School District, did you provide them with a
23 resume?
24 A. Yes.
01:32PM 25 Q. Does that resume discuss your position with

7
Lisa Ann White
3/29/10

1 EDP?

2 A. Yes.

3 Q. Is that something you still have access to,
4 your resume?

01:32PM 5 A. Yes.

6 Q. You could give it to your attorney if I asked?

7 A. Yes.

8 Q. Did you apply for any positions other than at
9 the Dangerfield School District between February of '04
01:32PM 10 and March of '07?

11 A. No.

12 Q. Have you ever given live testimony before
13 today?

14 A. No.

01:32PM 15 Q. Well, you're doing fine so far, and I think you
16 pretty much understand that in this format I'm asking you
17 questions that will primarily be about your job at EDP.
18 Do you understand that?

19 A. Yes.

01:32PM 20 Q. And you understand the court reporter has sworn
21 you in and she's taking down my questions and your
22 answers?

23 A. Yes.

24 Q. You're doing so far a real good job of
01:33PM 25 answering me audibly, yes or no, because we need those as

1 A. Well, these are -- they were new to using the
2 software, and they might not know how to print a report,
3 or they might not know how to -- they might -- they were
4 trained, but when you're trained and then later you
02:06PM 5 start using it, there is a lot that you forget that you
6 were trained on. And so they might get in there to do
7 something like reconcile their bank statement, and they
8 couldn't remember how to get started.

9 Q. And that would be an example where you could
02:06PM 10 assist them to help them get started on reconciling a
11 bank statement?

12 A. Yes.

13 Q. And that was based on your previous experience
14 with the software?

02:06PM 15 A. Previous experience, previous to what?

16 Q. To the time that you got the call.

17 A. Yes.

18 Q. To give you an example, a customer calls and
19 says, hey, we've been working on this conversion, we're
02:07PM 20 live, and I'm trying to reconcile a bank report, and I
21 don't remember how to do it. You tell them how to do it
22 based on your own experience, correct?

23 A. I would tell them how to do it based on
24 reading the manual.

02:07PM 25 Q. Would that be something that you would have to

1 pull from the shelf to read?

2 A. At first.

3 Q. And then you would gain experience where you

4 wouldn't have to do it?

02:07PM 5 A. Right.

6 Q. What manual are you talking about?

7 A. The EDPro financial or HR manual.

8 Q. Are those two separate manuals?

9 A. Well, at one time it was a real big, thick

02:07PM 10 book, but it got too big so they decided to separate

11 them.

12 Q. So there was an EDPro financial manual and then

13 a EDPro human resources manual?

14 A. Yes.

02:07PM 15 Q. Did you use both of those manuals?

16 A. Yes.

17 Q. And did you have them both at your desk?

18 A. Yes.

19 Q. Did you have your own office?

02:08PM 20 A. Towards the end I did, but until then I did

21 not.

22 Q. Did you share an office?

23 A. Yes.

24 Q. With whom?

02:08PM 25 A. When I first began, with Pam Christopher, and

1 then with Susie Briscoe and then with Brenda Wilkerson
2 and then Talina McElhany and Kelly Hampton.

3 Q. Were these all client liaisons?

4 A. No.

02:08PM 5 Q. Which ones were not?

6 A. Brenda Wilkerson was not, she was QC, and
7 Susie Briscoe was a trainer, and she became a client
8 liaison. Kelly Hampton was a trainer and became a
9 client liaison, and then the whole time I shared the
02:09PM 10 office with Talina, she was a client liaison.

11 Q. What about Pam Christopher?

12 A. Pam was.

13 Q. A client liaison?

14 A. The whole time I shared the office with her,
02:09PM 15 yes. She began as a trainer also, but when I came, she
16 was already a liaison.

17 Q. Was client liaison a position higher than the
18 trainer?

19 A. No.

02:09PM 20 Q. They were peers?

21 A. Yes.

22 Q. Was it a more desired position at Tyler based
23 on your perception?

24 MS. BAGLEY: Object to form.

02:09PM 25 Q. You can answer.

1 MS. BAGLEY: You can answer if you
2 understand.

3 A. Was it a more desired position?

4 Q. Right.

02:09PM 5 A. Not necessarily, but it was to me because I
6 didn't want to travel and be away from my family that
7 much.

8 Q. And the trainers had to do that?

9 A. Yes.

02:09PM 10 Q. Because they were actually on site at the
11 schools?

12 A. Yes.

13 Q. That's not something you typically had to do?

14 A. No.

02:10PM 15 Q. Is it something you ever had to do?

16 A. Yes.

17 Q. In what circumstances would you travel to the
18 schools?

19 A. Two different times. There was -- well, one
02:10PM 20 of the trainer's sons got ill, and she couldn't go, and
21 I went in her place, and then one time all of the
22 trainers were out at schools, and there was no one else
23 to go, so I went. I did go -- then later I did go to
24 the planning meetings with Chandra and with Richard
02:10PM 25 Fritz just so they could introduce me as the client

38
Lisa Ann White
3/29/10

1 go to the copy machine and copy a document, like part of
2 the manual if there was an update, and I had to make a
3 copy of it and punch it and put it in my notebook, or,
4 you know, recording the Bridge Track issues, that kind
02:19PM 5 of stuff.

6 Q. That all falls into the definition of --

7 A. Into miscellaneous, yes.

8 Q. That all falls under the definition of general
9 operations?

02:19PM 10 A. Yes.

11 Q. And these staff meetings that are referenced
12 here, those you had periodically?

13 A. Yes.

14 Q. And were those attended by the other client
02:19PM 15 liaisons?

16 A. Yes.

17 Q. Anyone else?

18 A. The trainers.

19 Q. What were the purposes of these staff meetings?

02:19PM 20 A. The manager just called them to kind of review
21 what was going on, what kind of problems were we having,
22 what kind of problems were the customers having. The
23 trainers could report when they had been out, that kind
24 of stuff.

02:19PM 25 Q. So you would make a report at those meetings

1 about the types of problems you were seeing?

2 A. Yes.

3 Q. And I think I asked this but just to make sure:

4 You would be getting -- in the support function, you

02:20PM 5 might be getting calls from different customers that you
6 had helped with the conversion?

7 A. Yes.

8 Q. Look at the third page, 553, at the end.

9 A. Yes.

02:20PM 10 Q. It says "training seminars via WebEx"?

11 A. Yes.

12 Q. What does that refer to?

13 A. The trainers would do training for the

14 customers, and sometimes we would go in and sit in on

02:20PM 15 those just to hear the questions that the customers had.

16 Q. So WebEx means you were attending via the

17 Internet?

18 A. Yes.

19 Q. Would you see the actual training session?

02:21PM 20 A. Yes.

21 Q. So there was a live trainer there?

22 A. The trainer would -- like we'd be in a

23 conference room like this, and she would actually have

24 the training session on her computer, and the clients

02:21PM 25 would dial in, and they had to get a number from WebEx.

1 At that time it went to live meeting, and that gave them
2 access to it, and then they had to either have a
3 microphone on their computer or use their phones.

4 Q. So this would be kind of remote training that
02:21PM 5 the customer would have. Instead of the trainer coming
6 to the customer's site, they would do it over the web?

7 A. Yes.

8 Q. And you would sit in on those training
9 sessions?

02:21PM 10 A. Yes.

11 Q. Did you do any of the training yourself during
12 those sessions?

13 A. No.

14 Q. Did you ever have any input?

02:21PM 15 A. Yes.

16 Q. What kind of input would you have?

17 A. Well, if they asked a question, you know,
18 about -- well, I'll just give an example. If the
19 trainer asked me to, then I would tell them how to do
02:22PM 20 what they were asking to do.

21 Q. Are there particular questions that a customer
22 might ask you would field rather than the trainer?

23 A. I don't remember.

24 Q. The next page, Page 554, talks about -- one of
02:22PM 25 the entries is "personal absences"?

41
Lisa Ann White
3/29/10

1 A. Yes.

2 Q. It says 16 hours, but there is only seven
3 written in. Do you know why that is?

4 A. We were allowed 16 hours a year.

02:22PM 5 Q. I see. So that refers to the total allotment?

6 A. Yes.

7 Q. And that's not something you would have typed
8 in, the 16 hours?

9 A. No. When I typed in 1015, that would
02:22PM 10 automatically come in there.

11 MR. MCKEEBY: Can we go off the record for
12 a second?

13 MS. BAGLEY: Yes.

14 (Recess.)

02:30PM 15 Q. I wanted to ask you a little bit about the
16 training that you did. I think you said you did that at
17 Brown County?

18 A. Yes, sir.

19 Q. And also once at West county?

02:30PM 20 A. No, the school was West.

21 Q. The name of the school was West?

22 A. Yes.

23 Q. Was it a high school?

24 A. It was just a little school district called
02:30PM 25 West.

1 Q. Did you ever lead that WebEx training?

2 A. No.

3 Q. That was always done by a trainer?

4 A. Yes.

02:36PM 5 Q. Did your manager tell you why you were -- that
6 he or she wanted you to attend a particular WebEx
7 training?

8 A. Yes.

9 Q. And would there be any consistency in the
02:36PM 10 reasons?

11 A. Yes.

12 Q. Why would they want you to attend?

13 A. Just to -- sometimes it was just to -- it was
14 training for me also, but sometimes it was just to hear
02:36PM 15 what the customers -- the questions the customers were
16 asking.

17 Q. For the purposes of you being able to answer
18 them, or so that you had a sense of what was out there?

19 A. That.

02:37PM 20 Q. The latter?

21 A. Yes, the latter.

22 Q. And in that sense, you were being trained to
23 have a -- be on the lookout for particular problems that
24 you might encounter in the future?

02:37PM 25 A. Yes.

47
Lisa Ann White
3/29/10

1 Q. Because you were also able to see how the
2 trainer responded to those particular questions?

3 A. Yes.

4 Q. Would you take notes when you were at these
02:37PM 5 WebEx trainings?

6 A. Yes.

7 Q. Just like in a notebook?

8 A. Like in a yellow tablet.

9 Q. Did you ever have occasion to use those notes
02:37PM 10 in fielding a question later on from a customer?

11 A. Yes.

12 Q. Were there other client liaisons who attended
13 these WebEx trainings?

14 A. Yes.

02:37PM 15 Q. Were they with you in the trainings, or were
16 they attending separate trainings or both?

17 A. Or both.

18 Q. Both?

19 A. Yes, both. I mean, I can't remember. If the
02:38PM 20 managers asked us to come, if there was more than one of
21 us, we both came.

22 Q. So it wouldn't be unusual for a trainer to do a
23 WebEx training and for you and Talina McElhany to both be
24 in the room during the training?

02:38PM 25 A. Right. But then there were times when Talina

1 McElhany had a customer she was working with, and she
2 was not free to come to the WebEx training, and I would
3 and she wouldn't and vice versa.

4 Q. Got it. If you would go to Beall 558. Are you
02:38PM 5 with me?

6 A. Yes.

7 Q. That one has a reference for "other absence (VP
8 approved in advance)." I take it that means you had
9 approval from your manager to miss some particular period
02:39PM 10 of time.

11 A. Yes.

12 Q. What's the difference between that and a
13 personal absence, just that the personal absence hadn't
14 been approved ahead of time?

02:39PM 15 A. I really can't remember what this other
16 absence was.

17 Q. Okay. But can you tell me why you would code a
18 particular absence with the 1010 number as opposed to the
19 1015 number?

02:39PM 20 A. Because my manager told me to.

21 Q. Okay. And that's what you think the reason was
22 in this instance?

23 A. Yes. That's the only time I would use that.
24 In looking at this, during this week was the Christmas
02:39PM 25 party?

1 Q. Right. That's entered down here as 7205.

2 A. And I know that the vice president said after
3 the Christmas party we could go home, and it wouldn't be
4 eight hours, so they would give us that time.

02:40PM 5 Q. What does that mean?

6 A. I mean, like the -- I mean, like if we
7 finished at, say, 2:00, then the other three hours the
8 vice president said, go home, you don't need to come
9 back, and so that's when they told us to put that there.

02:40PM 10 Q. The "other absence (VP approved in advance)"?

11 A. Yes.

12 Q. So on personal absences, in the next column
13 when you're putting in .50 for Monday, does that mean you
14 left early or you had an errand to run or something like
02:40PM 15 that?

16 A. Yes, I came in late that day.

17 Q. I see. That's why it's .50 hours?

18 A. Yes.

19 Q. And the same with Friday where instead of 8:00
02:41PM 20 o'clock it's 815, does that account for the .25?

21 A. Yes.

22 Q. Also in this time sheet, there is an account
23 number for "resolving customer problem." Do you see
24 that?

02:41PM 25 A. Yes.

1 A. Yes.

2 Q. And then it would be your job as the client
3 liaison -- or at least you were assigned this job -- to
4 review the bank statement and compare it to their
02:48PM 5 statement to see if you could identify the problem?

6 A. Yes.

7 Q. In consultation with the customer?

8 A. Yes.

9 Q. And you did that by a review and comparison of
02:48PM 10 the statements?

11 A. Well, we would just get the statement, and
12 then we would -- the customer and I together would look,
13 and we'd say, okay, this check is here, is it in your
14 bank statement. So we would go through all the checks
02:48PM 15 and make sure all the checks were there and reconciled.
16 We would -- we might start with the revenue, and we
17 would say, have you reconciled this. If it wasn't in
18 their system, then it was generally because it didn't
19 convert in. That was usually the problem.

02:48PM 20 So it was just a matter of just doing
21 what they had been doing but somebody holding their
22 hand.

23 Q. And walking them through the process?

24 A. Right.

02:49PM 25 Q. And you did that face-to-face in the one

1 instance, and you also did it over the telephone at
2 times?

3 A. Yes.

4 Q. And you would get these assignments
02:49PM 5 periodically from your manager when the customer would
6 bring them to the attention of EDP?

7 A. Yes.

8 Q. And would these be instances where the -- would
9 the customer be upset about the process?

02:49PM 10 A. They would get frustrated sometimes.

11 Q. Would they be frustrated because they thought
12 there was some problem with the software?

13 A. Yes.

14 Q. And you'd have to explain to them that that
02:49PM 15 wasn't necessarily the case?

16 MS. BAGLEY: Objection. You can answer.

17 Q. You can answer.

18 A. I didn't ever say that's not the case, but I
19 would just kind of show them that it wasn't the case.

02:50PM 20 Q. By going through the process you just
21 described?

22 A. Yes, uh-huh.

23 Q. Let me direct your attention to another entry
24 on this time sheet that says "internal trainer." What
02:50PM 25 does that mean?

1 A. That looks like -- an internal trainer would
2 have been where maybe I worked with someone, you know,
3 that was in the company.

4 Q. You were training them?

02:50PM 5 A. Yes.

6 Q. Like a new employee?

7 A. Yeah. I might have been working with a new
8 employee or something.

9 Q. I know this is back in '05. Do you have any
02:50PM 10 recollection of that?

11 A. No. No.

12 Q. Let me direct your attention to 573. Hold on
13 just a second.

14 A. Okay.

02:51PM 15 Q. This has an entry for "customer data
16 entry/conversion"?

17 A. Yes.

18 Q. This is a separate function that you, as a
19 client liaison, did?

02:52PM 20 A. Yes.

21 Q. In fact, this describes one of your most
22 significant job responsibilities in terms of the amount
23 of time spent?

24 A. Yes.

02:52PM 25 Q. All right. So what does -- are those two

1 A. Yes.

2 Q. Let's walk through it in a little bit more
3 detail. What you just described is what you called the
4 conversion process?

02:55PM 5 A. Yes.

6 Q. So I take it you were assigned a particular
7 school to do this conversion for.

8 A. To be the liaison, yes.

9 Q. And that comes from your manager?

02:55PM 10 A. Yes.

11 Q. And how was that communicated to you as the
12 client liaison?

13 A. Either they came to you personally and told
14 you, we're going to convert this school, and you're
02:55PM 15 going to be the liaison, or they announced it in a staff
16 meeting.

17 Q. Were there times when you had more than one
18 conversion for different school districts at the same
19 time?

02:55PM 20 A. Yes.

21 Q. Was that typical, unusual, something in
22 between?

23 A. When I first started, I didn't, but then I was
24 the only liaison for a while, and so that was typical
02:56PM 25 during that time. And once they hired the other two

1 liaisons after I was the only one, it was sometimes.

2 Q. But not as typical?

3 A. At this point not as typical.

4 Q. How long were you the only liaison where it was
02:56PM 5 typical?

6 A. Probably -- I'm not sure.

7 Q. Six months?

8 A. Six months.

9 Q. And what time in your tenure between '04 and
02:56PM 10 '07 was this period?

11 A. I probably was there a year before -- a year
12 to a year and a half before I was the only one, and then
13 that period of time lasted six months, six to nine
14 months, I would say.

02:57PM 15 Q. So this would have been sometime in '05, early
16 '06?

17 A. Yes.

18 Q. When you were the only client liaison?

19 A. Yes.

02:57PM 20 Q. At some point Talina McElhany became a client
21 liaison?

22 A. Yes.

23 Q. Had she talked to you about that decision?

24 A. She talked to me about -- I'm sorry, I'm not
02:57PM 25 sure what you're saying.

1 Q. I don't blame you. Did she have discussions
2 with you -- she was there at EDP as a customer support
3 representative, correct?

4 A. In the other building.

02:57PM 5 Q. Right. And you knew her through social
6 connections?

7 A. I knew her from just meeting her at EDP.

8 Q. Did at some point she talk to you about a job
9 opening, a client liaison position?

02:58PM 10 A. Yes.

11 Q. Did she express an interest in that position to
12 you?

13 A. Yes.

14 Q. And did you discuss the position with her and
02:58PM 15 let her know what it involved?

16 A. Yes.

17 Q. And she ultimately came onboard as a client
18 liaison?

19 A. Yes.

02:58PM 20 Q. Would you say that you encouraged her to come
21 onboard as a client liaison?

22 A. I can't say that I encouraged her, but I
23 didn't discourage her either.

24 Q. You just explained what the job involved?

02:58PM 25 A. Yes.

1 liaisons after I was the only one, it was sometimes.

2 Q. But not as typical?

3 A. At this point not as typical.

4 Q. How long were you the only liaison where it was
02:56PM 5 typical?

6 A. Probably -- I'm not sure.

7 Q. Six months?

8 A. Six months.

9 Q. And what time in your tenure between '04 and
02:56PM 10 '07 was this period?

11 A. I probably was there a year before -- a year
12 to a year and a half before I was the only one, and then
13 that period of time lasted six months, six to nine
14 months, I would say.

02:57PM 15 Q. So this would have been sometime in '05, early
16 '06?

17 A. Yes.

18 Q. When you were the only client liaison?

19 A. Yes.

02:57PM 20 Q. At some point Talina McElhany became a client
21 liaison?

22 A. Yes.

23 Q. Had she talked to you about that decision?

24 A. She talked to me about -- I'm sorry, I'm not
02:57PM 25 sure what you're saying.

1 Q. I don't blame you. Did she have discussions
2 with you -- she was there at EDP as a customer support
3 representative, correct?

4 A. In the other building.

02:57PM 5 Q. Right. And you knew her through social
6 connections?

7 A. I knew her from just meeting her at EDP.

8 Q. Did at some point she talk to you about a job
9 opening, a client liaison position?

02:58PM 10 A. Yes.

11 Q. Did she express an interest in that position to
12 you?

13 A. Yes.

14 Q. And did you discuss the position with her and
02:58PM 15 let her know what it involved?

16 A. Yes.

17 Q. And she ultimately came onboard as a client
18 liaison?

19 A. Yes.

02:58PM 20 Q. Would you say that you encouraged her to come
21 onboard as a client liaison?

22 A. I can't say that I encouraged her, but I
23 didn't discourage her either.

24 Q. You just explained what the job involved?

02:58PM 25 A. Yes.

1 Q. Okay. So is there a person -- let's go back to
2 our conversion process and, like I said, dig a little bit
3 deeper on some of these different points in time. You
4 would place an initial phone call to the school, and that
02:58PM 5 was for the purposes of getting information?

6 A. Yes.

7 Q. How did you know who to call?

8 A. Usually the first step in the conversion is
9 that we had -- for a while we had conversion planning
02:59PM 10 meetings that were conference calls, and the manager
11 would ask.

12 Q. Did that change?

13 A. Yes. We started going out to -- actually
14 going out to the schools to do those conversion planning
02:59PM 15 meetings.

16 Q. When did that start?

17 A. When did it start?

18 Q. Roughly.

19 A. Probably a year before I left.

02:59PM 20 Q. So for that year before you left, it was done
21 on a regular basis where you would actually go to a
22 school?

23 A. Yes.

24 Q. And that was for the purposes of introducing
02:59PM 25 you to the people that you would be dealing with?

1 Q. Okay. So is there a person -- let's go back to
2 our conversion process and, like I said, dig a little bit
3 deeper on some of these different points in time. You
4 would place an initial phone call to the school, and that
02:58PM 5 was for the purposes of getting information?

6 A. Yes.

7 Q. How did you know who to call?

8 A. Usually the first step in the conversion is
9 that we had -- for a while we had conversion planning
02:59PM 10 meetings that were conference calls, and the manager
11 would ask.

12 Q. Did that change?

13 A. Yes. We started going out to -- actually
14 going out to the schools to do those conversion planning
02:59PM 15 meetings.

16 Q. When did that start?

17 A. When did it start?

18 Q. Roughly.

19 A. Probably a year before I left.

02:59PM 20 Q. So for that year before you left, it was done
21 on a regular basis where you would actually go to a
22 school?

23 A. Yes.

24 Q. And that was for the purposes of introducing
02:59PM 25 you to the people that you would be dealing with?

1 A. Well, that was not the whole purpose of the
2 planning meeting, but they asked me to go just so, yes,
3 they could introduce me.

4 Q. Right. That was the purpose, as you understood
02:59PM 5 it, for having you there?

6 A. Yes.

7 Q. What happened at the planning meeting?

8 A. Chandra and Richard Fritz, they would just
9 explain the conversion process, the timeline, what was
03:00PM 10 going to happen, what we would need from them. They
11 would say, this is Lisa White, she's your liaison, and
12 the first thing that's going to happen is she's going to
13 be calling you and getting some data from you.

14 At that time they'd say, who does she
03:00PM 15 need to contact for -- we divided it up by financial and
16 human resources, those two contacts.

17 Q. So would the schedule and the go-live date be
18 set out in this planning meeting?

19 A. Yes.

03:00PM 20 Q. So you would be aware of that?

21 A. Yes.

22 Q. So then they would identify typically at this
23 planning meeting, at least during this period of time,
24 who the contact person was?

03:01PM 25 A. Yes.

1 Q. Was there a position that that contact person
2 typically had?

3 A. It depended on the size of the school. I
4 mean, if it was a small school, it might be one person
03:01PM 5 that you contacted for everything. Like Brown County,
6 it was just two employees, and I contacted the same
7 person for everything, but if it was a larger school, it
8 might be that you contacted like the business manager
9 for financial questions, but you would contact the
03:01PM 10 payroll person for HR questions.

11 Q. What about this initial call that you discussed
12 where you talked about entering into the parameter data
13 base?

14 A. Yes.

03:01PM 15 Q. Who would that call be to?

16 A. Well, once again, you know, you would find
17 out -- like schools generally start -- their year starts
18 9/1, but some schools start 7/1, and you would just get
19 some general information like that. And then if it was
03:01PM 20 a larger school, they might direct you to their payroll
21 clerk for like when are their pay dates, how often do
22 they get paid, you know, that kind of stuff.

23 Q. Is that what you mean by parameters, those
24 types of dates?

03:02PM 25 A. Yes.

1 Q. Was there a position that that contact person
2 typically had?

3 A. It depended on the size of the school. I
4 mean, if it was a small school, it might be one person
03:01PM 5 that you contacted for everything. Like Brown County,
6 it was just two employees, and I contacted the same
7 person for everything, but if it was a larger school, it
8 might be that you contacted like the business manager
9 for financial questions, but you would contact the
03:01PM 10 payroll person for HR questions.

11 Q. What about this initial call that you discussed
12 where you talked about entering into the parameter data
13 base?

14 A. Yes.

03:01PM 15 Q. Who would that call be to?

16 A. Well, once again, you know, you would find
17 out -- like schools generally start -- their year starts
18 9/1, but some schools start 7/1, and you would just get
19 some general information like that. And then if it was
03:01PM 20 a larger school, they might direct you to their payroll
21 clerk for like when are their pay dates, how often do
22 they get paid, you know, that kind of stuff.

23 Q. Is that what you mean by parameters, those
24 types of dates?

03:02PM 25 A. Yes.

1 Q. So your initial job would be to get that
2 information from the customer?

3 A. Yes.

4 Q. And you would do that over the telephone?

03:02PM 5 A. Yes.

6 Q. And how did you know what information to get?

7 A. I was given a sheet that told me what to ask.

8 Q. It told you the questions to ask?

9 A. Yes.

03:02PM 10 Q. And you would complete the sheet?

11 A. Yes.

12 Q. How long would that take to complete?

13 A. 30 minutes to an hour.

14 Q. And this would be in connection with the phone
03:02PM 15 call to the client?

16 A. Yes.

17 Q. What would you do with the sheet?

18 A. Well, it would go in -- they always had the
19 location on the system of the parameter data base. They
03:03PM 20 usually had a number, and they would tell us. And then
21 I would go in and put that information in, and I always
22 had an expanding folder like that (indicating) that I
23 kept everything in. You know, I keep everything.

24 Q. Right.

03:03PM 25 A. So I'd put it in a folder.

1 Q. But in terms of -- what did you do with it?

2 Did you send it to someone after you completed it?

3 A. No.

4 Q. Do you know if -- did the conversion programmer
03:03PM 5 reviewed it, or do you know?

6 A. No, I don't believe they ever reviewed it. It
7 was just that was what I was told to do, and he could
8 tell when he went to do it if there was something
9 missing or something that I hadn't gotten just because
03:03PM 10 the conversion wouldn't work if I missed something.

11 Q. But you were just getting information, right?

12 A. Right.

13 Q. So how -- help me. How would you missing
14 something have --

03:04PM 15 A. I put it into their -- the school district's
16 parameter data base. It had to be in there before he
17 could do a conversion.

18 Q. So you were entering information into the EDPro
19 data base?

03:04PM 20 A. Yes.

21 Q. For the new system?

22 A. Right.

23 Q. And so he -- and that information you were
24 getting from the school?

03:04PM 25 A. Right.

1 Q. But in terms of -- what did you do with it?

2 Did you send it to someone after you completed it?

3 A. No.

4 Q. Do you know if -- did the conversion programmer
03:03PM 5 reviewed it, or do you know?

6 A. No, I don't believe they ever reviewed it. It
7 was just that was what I was told to do, and he could
8 tell when he went to do it if there was something
9 missing or something that I hadn't gotten just because
03:03PM 10 the conversion wouldn't work if I missed something.

11 Q. But you were just getting information, right?

12 A. Right.

13 Q. So how -- help me. How would you missing
14 something have --

03:04PM 15 A. I put it into their -- the school district's
16 parameter data base. It had to be in there before he
17 could do a conversion.

18 Q. So you were entering information into the EDPro
19 data base?

03:04PM 20 A. Yes.

21 Q. For the new system?

22 A. Right.

23 Q. And so he -- and that information you were
24 getting from the school?

03:04PM 25 A. Right.

1 Q. And then after you did that entry function, the
2 conversion programmer was able to make an initial
3 determination of -- or at least an initial attempt to
4 convert?

03:04PM 5 A. Right. Once I got that information, I entered
6 it into the parameter data base, and then I either
7 e-mailed it or told the conversion programmer that it
8 was ready, and then they would try to do the first
9 conversion then.

03:04PM 10 Q. And that's where -- that would be the first of
11 the typically three conversions?

12 A. Right.

13 Q. Because the first conversion wouldn't be seen
14 unless there would be errors or issues that they would
03:05PM 15 encounter?

16 A. Right.

17 Q. And then they would report those errors back to
18 you?

19 A. Yes.

03:05PM 20 Q. And that would require you to go back to the
21 client to get more information?

22 A. That would require me telling the client that
23 they needed to fix those things in their old system.

24 Q. Did you have any role in assisting the customer
03:05PM 25 to determine what sets of data could be converted and

1 what needed to be started from scratch?

2 A. No.

3 Q. That doesn't ring true at all?

4 A. No.

03:06PM 5 Q. Was that someone else that did that, or is that
6 just something I'm not understanding to ask that
7 question?

8 A. I don't -- I might be misunderstanding you,
9 but we never started from scratch.

03:06PM 10 Q. So you were always converting information that
11 was already there, data that was already there?

12 A. Yes. Even if they weren't on EDP's old
13 system, they always had data that you had to get
14 converted in. You had employees that you had to pay,
03:06PM 15 and you had general ledger balances and stuff like that
16 that had to be converted in.

17 Q. So as I understand it, after the first
18 conversion, there was some type of spreadsheet that was
19 created that identified any problems or errors that were
03:07PM 20 revealed by the first attempt at conversion?

21 A. The conversion programmer would generate -- it
22 was usually the employees. You know, like there were
23 problems in personnel. They would make 50,000, but in
24 payroll, they made 60. Which one is right, you know?
03:07PM 25 In personnel they might be an assistant principal, and

1 Q. Was it a questionnaire?

2 A. I truly don't remember.

3 Q. What did you do with that document?

4 A. That I received from the lawyer?

03:42PM 5 Q. Yes, which you used to assist you in drafting
6 your declaration.

7 A. It seems like this was like e-mailed to me or
8 something, and I probably just -- I don't have the
9 e-mail after I did this. I did make a copy of this, but
03:43PM 10 I don't recall right now.

11 Q. Right. You made a copy of this and gave it to
12 the receptionist?

13 A. I made a copy for me to keep.

14 Q. For your own personal --

03:43PM 15 A. Yeah.

16 Q. Let's look at Paragraph 3 where it talks about
17 your job functions. I'm looking at the first sentence.
18 At the end of it, it talks about the new Windows-based
19 EDP Enterprises software, and that's EDPro?

03:43PM 20 A. Yes.

21 Q. And that's what we've been talking about today
22 in connection with the conversion work you were doing.
23 You were assisting the customer converting its data from
24 its previous system to EDPro?

03:43PM 25 A. Yes.

1 Q. And sometimes the previous system would be a
2 Unix system that EDP previously sold?

3 A. Yes.

4 Q. And then there were other times where it would
03:43PM 5 be a conversion to EDPro from a system that had not been
6 sold to it by EDP?

7 A. Yes.

8 Q. You worked on both types?

9 A. Yes.

03:44PM 10 Q. The next sentence says: "This process involved
11 the conversion of the customer's data from the existing
12 software to the new EDP Enterprises, Inc.'s software."

13 And we've talked generally about that
14 process today?

03:44PM 15 A. Yes.

16 Q. And the sentence goes on to say: "As well as
17 training the customers' employees on the use and
18 operation of the EDP Enterprises, Inc.'s software."

19 Now, we've talked about some of the
03:44PM 20 training you did. Is that what you were describing in
21 this sentence?

22 A. No.

23 Q. What training did you mean?

24 A. After the customer went live on the system,
03:45PM 25 like I said, you know, the trainers went out and trained

1 what needed to be started from scratch?

2 A. No.

3 Q. That doesn't ring true at all?

4 A. No.

03:06PM 5 Q. Was that someone else that did that, or is that
6 just something I'm not understanding to ask that
7 question?

8 A. I don't -- I might be misunderstanding you,
9 but we never started from scratch.

03:06PM 10 Q. So you were always converting information that
11 was already there, data that was already there?

12 A. Yes. Even if they weren't on EDP's old
13 system, they always had data that you had to get
14 converted in. You had employees that you had to pay,
03:06PM 15 and you had general ledger balances and stuff like that
16 that had to be converted in.

17 Q. So as I understand it, after the first
18 conversion, there was some type of spreadsheet that was
19 created that identified any problems or errors that were
03:07PM 20 revealed by the first attempt at conversion?

21 A. The conversion programmer would generate -- it
22 was usually the employees. You know, like there were
23 problems in personnel. They would make 50,000, but in
24 payroll, they made 60. Which one is right, you know?
03:07PM 25 In personnel they might be an assistant principal, and

70
Lisa Ann White
3/29/10

1 then in payroll they were a principal. So it was that
2 kind of thing. And they could give me something that
3 would show the employees with problems.

4 Q. And that would be in a spreadsheet?

03:07PM 5 A. It wasn't actually a spreadsheet. It just
6 was -- well, it looked kind of like a spreadsheet, but
7 in the actual software, there is a report you can run
8 that's called "Employees with Problems," and that's
9 usually what we ran.

03:08PM 10 Q. You would run that or the programmer would run
11 it?

12 A. Well, the programmer, and then we could too.

13 Q. Did you?

14 A. Yes.

03:08PM 15 Q. To determine what errors there might be out
16 there?

17 A. Well, once the programmer told me that they
18 were finished with the initial conversion or the second
19 conversion, they would give me something that the
03:08PM 20 conversion script generated, and so then I would
21 generate a report for the customer. So as the customers
22 were correcting those problems, I would run the
23 "Employees with Problems" just to see if it was going
24 down.

03:08PM 25 Q. If the customer was doing it correctly?

1 A. Right, if the number of employees with
2 problems was going down.

3 Q. And what was your purpose in running that?

4 A. Just to make sure they were making the
03:09PM 5 corrections they needed to make.

6 Q. And that had to do with the company meeting the
7 deadlines?

8 A. Yes.

9 Q. So "Employees with Problems" is a particular
03:09PM 10 type of error report that you could run?

11 A. Yes.

12 Q. What would you do if after running that
13 "Employees with Problems" report, you determined that the
14 client wasn't doing it quickly enough?

03:09PM 15 A. Quickly enough? Well, sometimes you would
16 have to call them and just say -- you know, give them a
17 deadline for errors. They agreed to that whenever they
18 agreed to do the conversion.

19 Q. Right, because they understood what the go-live
03:09PM 20 date was?

21 A. Right.

22 Q. You didn't have -- did you have any role in
23 setting the go-live date?

24 A. No.

03:10PM 25 Q. But you knew what that date was within the --

1 final conversion, how long would it typically last, or
2 would it vary?

3 A. It seems like it was usually about three
4 months, but it did vary.

03:16PM 5 MR. MCKEEBY: Laureen, as we get into the
6 documents that the company produced, can we agree that
7 beginning on Tyler Beall 32412 in this Deposition Exhibit
8 Number 1 --

9 Q. You may have to go through the documents, or
03:17PM 10 Laureen may have to assist you.

11 MS. BAGLEY: Can we just agree the
12 documents speak for themselves? Are you going to ask her
13 if they are identical?

14 MR. MCKEEBY: No, I just want to make sure
03:17PM 15 that's her signature.

16 MS. BAGLEY: Oh, okay.

17 A. Yeah, so far.

18 MS. RAY: Did you say 32412?

19 MR. MCKEEBY: Yes, that's the first one I
03:17PM 20 have.

21 A. 32412?

22 Q. Yes. Beginning with that document, there are a
23 series of documents that the company produced that appear
24 to contain your signature, and I just want to make sure
03:17PM 25 that you agree with me that that's your signature.

1 A. Yes.

2 Q. Go to 32408, if you would.

3 A. Okay.

4 Q. Do you have that one?

03:18PM 5 A. Yes.

6 Q. That one has a designation for "travel time"?

7 A. Yes.

8 Q. What does that mean?

9 A. Well, when we went on those planning

03:18PM 10 meetings -- or, I mean, when I went to train, when you

11 were actually driving to the school or whatever.

12 Q. So the -- what did you call them -- that was

13 the initial planning meeting?

14 A. That's usually what I did. There were three

03:19PM 15 times I did the training, but other than that, it would

16 have been the initial planning meetings.

17 Q. So what you're saying is that other than those

18 instances that we talked about where you did the

19 training, if we see "travel time" on your time sheets, it

03:19PM 20 means it was time spent driving to the planning meeting?

21 A. Right. And, you know, in this instance

22 there's three and a half on Wednesday and a quarter of

23 an hour on Thursday. That was when we probably went to

24 a hotel, and it took us 15 minutes the next morning to

03:19PM 25 get to the school.

1 Q. So that's probably the drive from the hotel to
2 the school?

3 A. Yes.

4 Q. And then the 3.75 on Friday is from the school
03:19PM 5 back to your home?

6 A. Right.

7 Q. Did you guys drive separately?

8 A. No.

9 Q. You drove the same car?

03:19PM 10 A. I never drove separately, no. We all went
11 together. Some people might, but I didn't.

12 Q. Did you ever take your vehicle?

13 A. I took my vehicle when I went to Brown County
14 and when I went to West.

03:20PM 15 Q. But at these planning meetings, you would drive
16 with Chandra?

17 A. Chandra or Richard.

18 Q. If you'll look at 32398, that looks like a week
19 where you were sick the entire week.

03:21PM 20 A. My daughter was.

21 Q. So you were at home caring for your daughter?

22 A. My daughter had a baby that week.

23 Q. I see. If you'll look at 32380, this is around
24 the Christmas season. It looks like you had travel time
03:22PM 25 there as well.

1 Q. Did you use any document to type it from?

2 A. Yes, I think there was something that was
3 sent.

4 THE WITNESS: Is was what y'all sent.

03:41PM 5 A. Something that was sent that had questions
6 that we were supposed to answer.

7 Q. So you're describing a document that you used
8 that your lawyer sent to you that was questions that the
9 lawyer asked?

03:41PM 10 A. Yes.

11 Q. And you used that document to draft this
12 declaration?

13 A. I can't remember.

14 Q. Okay. Well, what were you testifying about
03:41PM 15 then?

16 A. Well --

17 Q. You do agree you typed the document?

18 A. I do agree that I typed the document.

19 Q. And you used some other document to help you
03:42PM 20 with the contents of the document?

21 A. I did receive something from the lawyer, and I
22 typed this up from that.

23 Q. And the document that you received from the
24 lawyer, what form was it in?

03:42PM 25 A. I don't remember.

1 Q. Was it a questionnaire?

2 A. I truly don't remember.

3 Q. What did you do with that document?

4 A. That I received from the lawyer?

03:42PM 5 Q. Yes, which you used to assist you in drafting
6 your declaration.

7 A. It seems like this was like e-mailed to me or
8 something, and I probably just -- I don't have the
9 e-mail after I did this. I did make a copy of this, but
03:43PM 10 I don't recall right now.

11 Q. Right. You made a copy of this and gave it to
12 the receptionist?

13 A. I made a copy for me to keep.

14 Q. For your own personal --

03:43PM 15 A. Yeah.

16 Q. Let's look at Paragraph 3 where it talks about
17 your job functions. I'm looking at the first sentence.
18 At the end of it, it talks about the new windows-based
19 EDP Enterprises software, and that's EDPro?

03:43PM 20 A. Yes.

21 Q. And that's what we've been talking about today
22 in connection with the conversion work you were doing.
23 You were assisting the customer converting its data from
24 its previous system to EDPro?

03:43PM 25 A. Yes.

1 A. Terry Summers.

2 Q. Was that something that he did with you
3 one-on-one, or was it for a group of employees?

4 A. One-on-one.

02:03PM 5 Q. What was his position?

6 A. Vice president.

7 Q. So let's talk about a couple of these account
8 descriptions if we can.

9 A. Okay.

02:03PM 10 Q. Telephone support, what does that mean?

11 A. The schools would just call. When they had a
12 problem, they would call in, and I would just try to
13 help them solve their problem or tell them how to do
14 what they were trying to do.

02:04PM 15 Q. And would you get calls from a particular
16 subset of schools, or how would -- let me ask it a
17 different way.

18 How would a call come to you as a client
19 liaison?

02:04PM 20 A. Well, the liaisons were supposed to support
21 the schools that they converted for six weeks after they
22 converted them. It was more of an intense support than
23 just the customer service support.

24 Q. So they weren't part of the regular customer
02:04PM 25 service cue?

1 A. No.

2 Q. For a six-week period?

3 A. Supposedly for six weeks. It was always much
4 longer.

02:04PM 5 Q. But six weeks was the objective?

6 A. Right.

7 Q. Was that something that was in the customer's
8 contract, or do you know?

9 A. I don't know. I never saw the contract.

02:05PM 10 Q. But six weeks was what was communicated to you?

11 A. Yes.

12 Q. By your managers?

13 A. Yes.

14 Q. And so this support that's entered in this week
02:05PM 15 on the document that's labeled Beall 551, that's what
16 you're talking about?

17 A. Yes.

18 Q. Customers, schools who you assisted with the
19 conversion calling you to ask questions?

02:05PM 20 A. Yes.

21 Q. And would this be possibly more than one
22 school?

23 A. Yes.

24 Q. And you said you would try to help solve their
02:05PM 25 problems. What kind of problems would they have?

1 A. Well, these are -- they were new to using the
2 software, and they might not know how to print a report,
3 or they might not know how to -- they might -- they were
4 trained, but when you're trained and then later you
02:06PM 5 start using it, there is a lot that you forget that you
6 were trained on. And so they might get in there to do
7 something like reconcile their bank statement, and they
8 couldn't remember how to get started.

9 Q. And that would be an example where you could
02:06PM 10 assist them to help them get started on reconciling a
11 bank statement?

12 A. Yes.

13 Q. And that was based on your previous experience
14 with the software?

02:06PM 15 A. Previous experience, previous to what?

16 Q. To the time that you got the call.

17 A. Yes.

18 Q. To give you an example, a customer calls and
19 says, hey, we've been working on this conversion, we're
02:07PM 20 live, and I'm trying to reconcile a bank report, and I
21 don't remember how to do it. You tell them how to do it
22 based on your own experience, correct?

23 A. I would tell them how to do it based on
24 reading the manual.

02:07PM 25 Q. Would that be something that you would have to

90
Lisa Ann White
3/29/10

1 Q. And sometimes the previous system would be a
2 Unix system that EDP previously sold?

3 A. Yes.

4 Q. And then there were other times where it would
03:43PM 5 be a conversion to EDPro from a system that had not been
6 sold to it by EDP?

7 A. Yes.

8 Q. You worked on both types?

9 A. Yes.

03:44PM 10 Q. The next sentence says: "This process involved
11 the conversion of the customer's data from the existing
12 software to the new EDP Enterprises, Inc.'s software."

13 And we've talked generally about that
14 process today?

03:44PM 15 A. Yes.

16 Q. And the sentence goes on to say: "As well as
17 training the customers' employees on the use and
18 operation of the EDP Enterprises, Inc.'s software."

19 Now, we've talked about some of the
03:44PM 20 training you did. Is that what you were describing in
21 this sentence?

22 A. No.

23 Q. What training did you mean?

24 A. After the customer went live on the system,
03:45PM 25 like I said, you know, the trainers went out and trained

1 them, but when they started using it, there was lots of
2 stuff they forgot, so I would have to actually walk them
3 through how to do something.

4 Q. So this is during that six-week approximately
03:45PM 5 window in which you were providing support, you would
6 also do some on-the-fly training?

7 A. Yes. I mean -- yes.

8 Q. Because you would show them how to deal with a
9 particular issue while you were on the phone with them
03:45PM 10 addressing that issue? That's the type of training you
11 meant in that context?

12 A. Well, if they called and said, I need to do a
13 journal entry, and I don't remember how to do it, I
14 would say, you go here, and you do this, and then you do
03:45PM 15 this and do that.

16 Q. That's training?

17 A. If you want to call it training, yes.

18 Q. I'm asking if that's what you meant when you
19 used the term "training."

03:45PM 20 A. Yes.

21 Q. You were showing them how to do a particular
22 function?

23 A. Yes.

24 Q. You wouldn't just do it yourself and say, okay,
03:46PM 25 client, it's done. You wanted them to know how to do it?

1 Q. And sometimes the previous system would be a
2 Unix system that EDP previously sold?

3 A. Yes.

4 Q. And then there were other times where it would
03:43PM 5 be a conversion to EDPro from a system that had not been
6 sold to it by EDP?

7 A. Yes.

8 Q. You worked on both types?

9 A. Yes.

03:44PM 10 Q. The next sentence says: "This process involved
11 the conversion of the customer's data from the existing
12 software to the new EDP Enterprises, Inc.'s software."

13 And we've talked generally about that
14 process today?

03:44PM 15 A. Yes.

16 Q. And the sentence goes on to say: "As well as
17 training the customers' employees on the use and
18 operation of the EDP Enterprises, Inc.'s software."

19 Now, we've talked about some of the
03:44PM 20 training you did. Is that what you were describing in
21 this sentence?

22 A. No.

23 Q. What training did you mean?

24 A. After the customer went live on the system,
03:45PM 25 like I said, you know, the trainers went out and trained

1 them, but when they started using it, there was lots of
2 stuff they forgot, so I would have to actually walk them
3 through how to do something.

4 Q. so this is during that six-week approximately
03:45PM 5 window in which you were providing support, you would
6 also do some on-the-fly training?

7 A. Yes. I mean -- yes.

8 Q. Because you would show them how to deal with a
9 particular issue while you were on the phone with them
03:45PM 10 addressing that issue? That's the type of training you
11 meant in that context?

12 A. Well, if they called and said, I need to do a
13 journal entry, and I don't remember how to do it, I
14 would say, you go here, and you do this, and then you do
03:45PM 15 this and do that.

16 Q. That's training?

17 A. If you want to call it training, yes.

18 Q. I'm asking if that's what you meant when you
19 used the term "training."

03:45PM 20 A. Yes.

21 Q. You were showing them how to do a particular
22 function?

23 A. Yes.

24 Q. You wouldn't just do it yourself and say, okay,
03:46PM 25 client, it's done. You wanted them to know how to do it?

1 A. No, I would not do it and just say it was
2 done.

3 Q. But you could have?

4 A. No.

03:46PM 5 Q. Why not, because you didn't have the
6 information?

7 A. Because we were told never to do that.

8 Q. Right. That wasn't your job?

9 A. That's not my data. It's the school's.

03:46PM 10 Q. And it was also your job to help the client
11 understand the system, right?

12 MS. RAY: Object to form.

13 MS. BAGLEY: You can answer.

14 A. Yes.

03:46PM 15 Q. Jumping down a few lines (reading): "During
16 the conversion" -- do you see where I'm reading?
17 (Reading) "During the conversion process, I would verify
18 the customer's data after it was converted."

19 Did I read that accurately?

03:46PM 20 A. Yes.

21 Q. What function does that describe?

22 A. Like I said before, when the conversion
23 programmer would convert the data into EDPro, then, you
24 know, I would start making sure that everything came in
03:47PM 25 the same as it was in the old system, I mean, the

1 A. No, I would not do it and just say it was
2 done.
3 Q. But you could have?
4 A. No.
03:46PM 5 Q. Why not, because you didn't have the
6 information?
7 A. Because we were told never to do that.
8 Q. Right. That wasn't your job?
9 A. That's not my data. It's the school's.
03:46PM 10 Q. And it was also your job to help the client
11 understand the system, right?
12 MS. RAY: Object to form.
13 MS. BAGLEY: You can answer.
14 A. Yes.
03:46PM 15 Q. Jumping down a few lines (reading): "During
16 the conversion" -- do you see where I'm reading?
17 (Reading) "During the conversion process, I would verify
18 the customer's data after it was converted."
19 Did I read that accurately?
03:46PM 20 A. Yes.
21 Q. What function does that describe?
22 A. Like I said before, when the conversion
23 programmer would convert the data into EDPro, then, you
24 know, I would start making sure that everything came in
03:47PM 25 the same as it was in the old system, I mean, the

1 balances. You know, if an employee was supposed to get
2 paid X number of dollars, that it came in the system
3 that way.

4 Q. So how would you do this verification?

03:47PM 5 A. Well, there was just a verification checklist
6 that you went through that I was given when I was hired,
7 and that's how I did it.

8 Q. And is that different from when you were
9 checking the client's work to make sure they were
03:47PM 10 addressing the errors? Is that different?

11 A. Yes.

12 Q. This is a separate function where you're
13 verifying that the data has been entered correctly?

14 A. That it has been converted correctly.

03:48PM 15 Q. Then it says: "When I found an error, I would
16 contact the customer and assist them with correcting the
17 error."

18 A. Yes, I would tell them that they needed to
19 correct it.

03:48PM 20 Q. How would you find the error?

21 A. Well, like I say, there was this checklist,
22 and there was just, you know, steps that you went
23 through, and, I mean, if something didn't -- I mean, if
24 the data didn't match, then there was an error, and, you
03:48PM 25 know, like I say, a lot of times it would just be, what

1 is right. I would just have to ask them what is right.

2 Q. What is the accurate information?

3 A. Yes.

4 Q. Because what you would see when you were
03:48PM 5 verifying the customer's data was that there was
6 potentially some discrepancy in the data?

7 A. Right.

8 Q. That would be one example?

9 A. Right.

03:49PM 10 Q. This next sentence talks about assisting the
11 on-site implementation team while they were training the
12 customer. Do you see that?

13 A. Where are you?

14 Q. I'm in the next sentence where it starts: "I
03:49PM 15 participated in the conversion planning meetings."

16 We've talked about that?

17 A. Oh, yeah.

18 Q. You trained customers how to operate the new
19 software program. We talked about that?

03:49PM 20 A. Yes.

21 Q. And this concept, you assisted the on-site
22 implementation team --

23 A. Yes.

24 Q. -- I don't think we've talked about that.

03:49PM 25 A. When the trainers -- and they were the on-site